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 DEPUTY DIRECTOR

December 15, 1995

Carl Ross  
 Red Eagle Properties, Ltd.  
 2020 Lynx Trail  
 Ontario, CA 91761

Subject: Case Closure

Re: Fullerton Business Park North  
 1551 East Orangethorpe Avenue  
 Fullerton, CA 92631  
 O.C.H.C.A. Case # 94IC29

Dear Mr. Ross:

This letter confirms the completion of remedial action at the above referenced site. With the provision that the information provided to this Agency was accurate and representative of existing conditions, it is the position of this office that no further action is required at this time.

This confirmation of completion is limited in scope. It is limited to site conditions made known to this Agency under the above referenced case number. It is based on an evaluation of the health threat presented by the inhalation, ingestion, or dermal absorption of the residual contaminants. In addition, this evaluation considered the present and proposed use of the property. Changes in the present or proposed land use may require further site characterization and/or site mitigation activity.

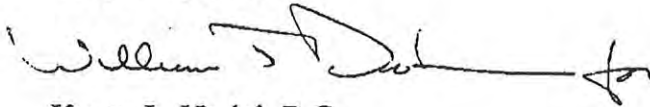
The presence of chlorinated hydrocarbons and the potential for residual contamination present at this site to cause groundwater contamination had been made known to the Santa Ana Regional Water Quality Control Board. The Regional Board decided that no groundwater investigation will be required for this site at this time.

Carl Ross  
December 15, 1995  
Page 2

Please be advised that this letter does not relieve you of any liability under the California Health and Safety Code or Water Code for past, present or future operations at the site. Nor does it relieve you of the responsibility to clean up existing, additional or previously unidentified conditions at the site which cause or threaten to cause pollution or nuisance or otherwise pose a threat to water quality or public health. It is the property owner's responsibility to notify this Agency of any changes in future contamination findings or site usage.

If you have any questions regarding this matter, please contact Luis Lodrigueza at (714) 667-3717.

Very truly yours,



Karen L. Hodel, R.G.  
Program Manager  
Hazardous Materials Management Section  
Environmental Health Division

KLH:WJD:LL:

cc: Robert Holub, Santa Ana Regional Water Quality Control Board  
Henry Ames, Converse Consultants - Orange County

## CASE CLOSURE REPORT

O.C.H.C.A. Case No.: 94IC29

December 14, 1995

D.B.A: Fullerton Business Park North  
1551 E. Orangethorpe Avenue  
Fullerton, CA 92631

R.P.: Carl Ross/Red Eagle Properties, Ltd.

Current Land Use: Light industrial/commercial

Adjacent Land Use: Commercial

Future Land Use: Light industrial/commercial

Contaminants	Highest Concentrations in Soil (mg/kg)								PRGs (ppm)
	Initial				Final				
	15'	20'	25'	Other	15'	20'	25'	30'	
TRPH	3,600	NT	12	12 (40')	NT*	NT	NT	NT	---
PCE	84.5	96	92	17.5 (30')	6.2	12.8	25.3	10.6	25
TCE	NT	NT	NT	0.42 (95')	1.1	3.4	1.0	1.2	17
1,1,1 TCA	NT	NT	NT	0.007 (60')	0.59	5.6	19.6	0.9	3,000
1,1 DCE	NT	NT	NT	0.16 (60')	N.D.	3.1	0.89	N.D.	0.082

Deepest Remaining Contamination:

PCE	0.11 ppm	@ 60' bgs
TCE	0.16 "	@ 105' bgs
1,1 DCE	0.056 "	@ 105' bgs
1,1,1 TCA	0.0068 "	@ 60' bgs

\*Not Tested

Soil Types: Interbedded sandy silt, silty sand and silty clay/clayey silt, the latter two predominating at 15' to 20' bgs

Depth To Groundwater: 115 ft bgs, measured

### Case Summary & Closure Rationale

This property was acquired by Red Eagle Properties from Resolution Trust Corporation in May 1994 and was sold to a new owner, Elden County Affaire, a furniture manufacturer, in March 1995.

Two clarifiers, discovered during a 1992 site investigation, were removed in September 1994. These were located in the northeast section of the property, one each at the northern and southern sides of the existing warehouse. Soil samples collected from the excavations showed elevated TRPH and PCE levels in the southern clarifier area; no



contamination was detected in soil beneath the clarifier located north of the impacted area. That entire portion of the property is now paved with concrete.

Seven initial, followed by 9 other, soil geoprobes were advanced around the impacted area to define the vertical and lateral extent of contamination. Two other deep borings were also drilled with the intent of installing groundwater monitoring wells. Saturated conditions were encountered at a depth of 115' bgs, but the borings were not advanced to groundwater due to the presence of about 50 ft of soil column above the water table that had not been impacted by PCE---although TCE and DCE were detected in one borehole in alternating silt and clay lenses down to a depth of 105 ft bgs.

The most highly impacted horizon was at the depth of 15' to 25' bgs, and HCA evaluation of the excess lifetime cancer risk (ELCR) for PCE occurrence here indicated unacceptable risk levels. Remediation of the impacted soil was thus undertaken with a soil vapor extraction system which operated for about 3 months from August to November 1995. Pulsing was conducted in mid-November and VOC measurements showed no re-start spiking of contamination; instead, a further decline in VOC concentrations was observed during the first week of operation after the system shutdown.

Confirmation boring was therefore undertaken on December 1, 1995. Three boreholes were installed adjacent to each of the 3 original boreholes that showed the most badly impacted soil, and samples collected at depths that showed the highest levels of PCE. Laboratory analytical results showed that the remediation had significantly reduced soil PCE concentrations by as much as 99% at 15' bgs, 87% at 20' bgs and 84% at 25' bgs in the two most impacted locations. A third, relatively less contaminated spot showed an 11% decrease in PCE at 25' bgs.


In addition to PCE, the following were also detected in the soil column: TCE, DCE and TCA. The former owner's consultant, Converse Consultants-Orange County, however, felt that---in spite of these degradation products---residual VOC concentrations are at such low levels as to pose any significant health threat, and that no further action is needed at this time.

Re-evaluation of the health risk arising from this residual contamination using HCA's vapor diffusion model showed that the combined ELCR from the carcinogenic chemicals PCE, TCE and DCE is less than  $1.0 \times 10^{-6}$ .

The SARWQCB, after meeting with Red Eagle representatives in November 1995, decided that Red Eagle did not discharge the PCE and other contaminants on to site; and that Red Eagle did not own the property during the time the discharges took place. In view of this, and the acknowledged undertaking by Red Eagle of diligent efforts to mitigate the soil impact by operating a soil vapor extraction system after determining

that past discharges had impacted the site, the SARWQCB withdrew its earlier request to Red Eagle to investigate groundwater (see SARWQCB letter to Red Eagle dated December 11, 1995). Furthermore, although the SARWQCB is unable "to absolve any current property owner of responsibility for any site investigation or cleanup, considering that the soil impacts at this site have been adequately mitigated, it is not considering issuing an order requiring a groundwater investigation at this time."

In light of the above discussion, it is recommended that this case be closed.

  
Luis Lodrigueza  
Hazardous Waste Specialist  
12/15/95

  
12/15/95